



E-ZPass Group – 119 Lower Beech Street, 2nd Floor, Wilmington DE. 19805
Phone: 302-577-1333 FAX: 302-577-1329

March 15, 2012

Received & Inspected

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FCC Mail Room

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW Room TW-A325
Washington, DC 20554

RE: Request by Progeny LMS, LLC for Waiver of Certain Multilateration and Monitoring Service Rules. WT Docket No. 11-49

Dear Secretary Dortch:

I am contacting you on the behalf of the Members of the E-ZPass Group regarding the above-referenced subject. The E-ZPass Group is an association of 24 toll agencies in 14 states. We are the world's largest interoperable toll collection system, collecting \$5.5 Billion in toll revenue annually. The E-ZPass Group uses Radio Frequency Identification that operates in the 915 megahertz ("MHz") band. The system is comprised of base stations licensed by the Federal Communications Commission ("FCC") on a co-primary geographic area basis and in-vehicle (mobile) devices that operate under Part-15 of the FCC rules and communicate with the base stations. The E-ZPass Group currently has more than 22 million RFID ("mobile") devices issued to customers across the United States.

The 24 Members of the E-ZPass Group are:

■Buffalo and Fort Erie Public Bridge Authority ■Burlington County Bridge Commission
■Delaware Department of Transportation ■Delaware River and Bay Authority ■Delaware River Joint Toll Bridge Commission ■Delaware River Port Authority ■Illinois State Toll Highway Authority ■ITR Concession Company, LLC ■Massachusetts Department of Transportation ■Maryland Transportation Authority ■Maine Turnpike Authority ■New Hampshire Department of Transportation ■New Jersey Turnpike Authority ■New York State Bridges Authority ■New York State Thruway Authority ■Ohio Turnpike Commission ■Port Authority of New York & New Jersey ■The Pennsylvania Turnpike Commission ■Rhode Island Turnpike and Bridge Authority ■Skyway Concession Company ■South Jersey Transportation Authority ■Triborough Bridge and Tunnel Authority ■Virginia Department of Transportation ■West Virginia Parkway Authority

As you see, our members are made up of State and Local agencies that provide vital transportation links and services to the citizens of those states and communities as well as supporting the nation as a whole by providing the necessary roadway

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infrastructure to help move people and goods throughout the country. These facilities are paid for by the revenues collected by our member agencies.

The 915 MHz frequency used by E-ZPass is the same frequency which all electronic toll collection systems in the United States currently operate on, as well as in other systems such as the commercial vehicle highway weigh station preclearance systems which is a major part of the US Department of Transportation's Federal Motor Carrier Safety Administration's Commercial Vehicle Information Systems and Networks ("CVISN"). CVISN uses a dual function E-ZPass transponder to support this important USDOT program as well as other systems of vital importance to transportation.

The E-ZPass Group has a major concern of the proposed operation of any other radio system in the same band and/or vicinity of toll facilities, as this has the potential to cause interference with our licensed equipment and put the toll revenues of the member agencies at risk. The E-ZPass Group members have not been contacted by Progeny to determine if there will be any interference from their mobile or base units when they are in the vicinity of our infrastructure. Thus, we do not feel that the proposed scope of their proposal and study has addressed the potential of interference with our systems.

We respectfully request that any action of the FCC in making a decision whether or not to allow Progeny permission to operate mobile radio transmitters and high power base stations will ensure the E-ZPass Group that the devices will not interfere with our members licensed systems and potentially endanger their revenues as well as their customer service.

If you have any questions or are in need of further information, please feel free to contact me (302) 577-1333. Thank you in advance for your attention to this matter.

Sincerely,

A handwritten signature in dark ink, appearing to read 'PJ Wilkins', with a long horizontal flourish extending to the right.

PJ Wilkins
Executive Director

PJ/lw